



DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
WASHINGTON, D.C. 20224

COMMUNICATIONS AND LIAISON

SEP - 3 2003

MEMORANDUM FOR RON ROSH
DIRECTOR, FILING SYSTEMS DIVISION

FROM: Maya A. Bernstein 
Privacy Advocate

SUBJECT: Archival and Retrieval Facility (ARF)
Privacy Impact Assessment (PIA)

The Office of the Privacy Advocate has reviewed the Privacy Impact Assessment for the Archival and Retrieval Facility (ARF) system. Based on the information you provided, we do not have any privacy concerns that would preclude this system from operating. However, a revised PIA is required when considering any future upgrades or major modifications to the system.

We will forward a copy of the PIA to the Director, Security Services Mission Assurance Certification Program Office, to be included in the Security Accreditation Package for formal acceptance for operation. The Director, Security Policy Support and Oversight, who has security oversight responsibility, may request information concerning the statements contained in the PIA to ascertain compliance with applicable security requirements.

If you have any questions, please contact me at 202-927-5170, or your staff may contact Susan Dennis at 202-622-5438.

Attachment

cc: Director, Security Services Mission Assurance, Certification Program
Office M:S:A
Director, Security Policy Support and Oversight M:S:S
Division Information Officer IS

Privacy Impact Assessment Archival and Retrieval Facility (ARF)

ARF System Overview

The Archival and Retrieval Facility (ARF) processed electronically filed tax returns from tax year 1987 until tax year 1997. The subsequent tax years are processed by the Tax Return Database (TRDB). Tax years 1996 and 1997 remain on the ARF in the following service centers: Andover, Austin, Cincinnati, Memphis, Ogden and Philadelphia. The ARF processed IMF data from the Electronic Filing (ELF) Returns Processing Subsystem and Business Master File (BMF) data from the Magnetic Tape Subsystem. The ARF was created to allow input of corrections to tax returns with identified errors from the Generalized Unprocessable Framework (GUF), BMF Error Resolution System (ERS), and BMF Unprocessable ERS. It also allowed for the archiving and storage of error free tax returns such as Individual Master File (IMF) NON-ERS returns, corrected returns (IMF One-Step Corrections) and BMF NON-ERS. All returns are currently included. The ARF was implemented on a local area network (LAN), laser printers, optical disk storage, and tape drives. The tax returns are stored for six years and nine months on optical disks then destroyed or printed. The printed tax returns are shipped to the Paper Files Unit in the service center.

Data in the System

1. Description of Data on Archival and Retrieval Facility (ARF)

Taxpayer Information

The ARF currently has Form 1040 family and 94X family tax returns for tax years 1996 and 1997.

Employee Information

The Archival and Retrieval Facility is not designed to store information on IRS employees except information on the employees who access Archival and Retrieval Facility. All employees access the system through an identification and authentication log on process.

Other Information

No other information is stored on Archival and Retrieval Facility.

2. Sources of Data on Archival and Retrieval Facility

Tax years 1996 and 1997 are currently stored on the ARF.

2a. What IRS files and databases are used?

The ARF ceased data input in 1998. The database used by the Archival and Retrieval Facility is

2b, 2c & 2d. What Federal agencies, State & Local agencies are providing data for use in the system?

No Outside, State or Local Agencies provide data to Archival and Retrieval Facility. No other third party data sources are used other than those mentioned above. The only employee information stored on the system is information relative to employee logins.

2e. What information will be collected from the taxpayer/employee?

No additional information is collected on a taxpayer or employee, other than login ids and passwords of selected employees.

3a. How will data be collected from sources other than IRS records and the taxpayer be verified for accuracy?

The data came from internal sources within IRS that validity checked the data prior to sending it to the ARF.

3b. How will data be checked for completeness?

The data was originally checked for completeness by comparing the record counts on the magnetic tapes input with the count by the Collection Information System (COINS) software on the Archive Server.

3c. Is the data current? How do you know?

The data on the ARF is prior year data (TY96 and TY97). These records are historical recordings of the information received from the taxpayer and there is no program or facility which will allow the data to be altered.

4. Are the data elements described in a detail in a document? If yes, what is the name of the document?

Yes, all data elements are detailed in various documents:

Electronic Return File Specifications and Record Layouts for Individual Income Tax Returns - Publication 1346.

Technical Specifications Guide for the Electronic Filing of Form 941 Employer's Quarterly Tax Return, Publication 1855

Form 941, Employer's Quarterly Federal Tax Return -- File Specifications, Processing Criteria, Publication 1264

Archival and Retrieval Facility FSP - dated 09-01-98.

Access to the Data on the ARF

1. Who will have access to the data in the system?

Access to the ARF is limited to Tax Examiners in the Electronic Filing Unit and File Clerks in the Paper Files Unit. All local System Administrators of the system have access as well to allow for quick problem research or resolution.

2. How is access to the data by a user determined?

Access to the ARF is determined by the user's need to know. Users apply locally for userid and passwords.

3. Will users have access to all data on the system or will the user's access be restricted? Explain.

The front-end application on the Graphics Workstation requires the users to login with a userid and password. The prior year returns were corrected when they were current tax returns and the corrected (final) image was written to the optical disk. The workstation software does not allow changes to prior year tax returns, the only functions that can be performed are Retrieve and Print. These are the functions performed by the users in the Electronic Filing Unit and the Paper Files Unit.

4. What controls are in place to prevent the misuse of data by those having access?

The ARF has an Audit Trail database file that tracks the users and the functions they performed.

5a. Do other systems share data or have access to data in this system? If yes, explain.

No, currently no other system shares data or has access to the ARF.

5b. Who will be responsible for protecting the privacy rights of the taxpayers and employees affected by the interface?

Currently, the IRS receives annual training on the Taxpayer Browsing Act of 1997 regarding unauthorized taxpayer account access, as well as Disclosure Awareness training. Employees are required to sign an annual UNAX awareness certification indicating that they understand their responsibilities to safeguard and protect tax return data.

6a. Will other agencies share data or have access to data in this system?

There is no access to the ARF or its databases outside the IRS.

6b. How will the data be used by the agency?

The tax returns may be used to conduct tax audit examinations or be printed upon request by the taxpayer.

6c. Who is responsible for assuring proper use of the data?

The Business owner and the System Administrator work in conjunction to maintain proper usage of the data. The Director of Electronic Tax Administration and the Director of the Service Center where the information is stored are responsible for the proper use of the information.

6d. How will the system ensure that agencies only get information they are entitled to under IRC 6103?

N/A

Attributes of the Data

1. Is the use of the data both relevant and necessary to the purpose for which the system is being designed?

The data available on the ARF is not only relevant, but it also serves as the only source of Electronically Filed Tax Returns for the applicable tax years.

2a. and 2b. Will the system derive new data or create previously unavailable data about an individual through aggregation from the information collected? Will the new data be placed in the individuals record (taxpayer or employee)?

The system is not used to derive or create new information on taxpayers by matching taxpayer records, and no additional information is placed in any taxpayer or employee record.

2c. Can the system make determinations about taxpayers or employees that would not be possible without the new data?

This system cannot make determinations about taxpayers or employees.

2d. How will the new data be verified for relevance and accuracy?

The ARF does not receive any new data.

3a. If data is being consolidated, what controls are in place to protect the data from unauthorized access or use?

The data is not being consolidated.

3b. If processes are being consolidated, are the proper controls remaining in place to protect the data and prevent unauthorized access? Explain?

Processes are not being consolidated.

4. How will the data be retrieved? Can it be retrieved by personal identifier? If yes, Explain.

Yes, data can be retrieved via SSN and/or taxpayer name. The data is retrieved via a front-end application on the Graphics Workstation. The user is required to input their userid and password then input the SSN/taxpayer name to retrieve records.

The user ID has to be in the _____ for both the FileServer and the DatabaseServer, also the ARF has a _____ database that contains all user ids. The users ID must also be in this database. The local System Administrator places the user in the _____. The user is placed in the _____ User Profile by the local supervisor of the work or the System Administrator. The User Profile also identifies the work functions the user can perform, and type of tax returns they are authorized to access. The user must be trained in using the application. The ARF does not use a personal identifier.

What are the potential effects on the due process rights of taxpayers and employees of:

4a. Consolidation and linkage of files and systems:

There is no effect on due process rights--files are not consolidated or linked.

4b. derivation of data:

There is no effect on due process rights—there is no derivation of data using this information.

4c. accelerated information processing and decision making:

There is no use of accelerated information processing and it will not impact decision making.

4d. Use of new technologies:

There is no use of new technologies.

Maintenance and Administrative Controls

1a. Explain how the system and its use will ensure equitable treatment of taxpayers and employees.

Requests for prints of tax returns are generated via the Integrated Data Retrieval System (IDRS) system. These requests come from taxpayers requesting copies of their tax returns and IRS employees performing their duties (Examination, Collection etc.). This use has no effect on the equitable treatment of taxpayers.

1b. If the system is operated in more than one site, how will consistent use of the system and data be maintained in all sites?

Yes, the system is operated at more than one site. To ensure consistent use, all employees are required to follow procedures outlined in the Internal Revenue Manual relevant to this system.

1c. Explain any possibility of disparate treatment of individuals or groups.

There is no possibility of disparate treatment of individuals or groups in the use of this system.

2a What are the retention periods of data in this system?

The tax returns are stored for six years and nine months on optical disk then destroyed or printed. IRM 1(15)59.26 Records Control Schedule 206 governs the retention periods for tax returns.

2b What are the procedures for eliminating the data at the end of the retention period? Where are the procedures documented?

Prior to the statute of limitations expiration the service center receives a list of tax returns that have had their statutes extended. These returns are printed and sent to Paper Files Unit and are no longer considered Electronically Filed Tax Returns. Then the service center destroys the optical disk. A memorandum dated July 29, 1997; "Disposition of Tax Returns" was signed by Terence H. Lutes, National Director, Electronic Programs Operations. This memorandum references IRM 1(15)59.26 Records Control Schedule 206, which covers disposition of tax returns.

2c. While the data is retained in the system, what are the requirements for determining if the data is still sufficiently accurate, relevant, timely and complete to ensure fairness in making determinations?

These are historical records of electronically filed tax return and cannot be modified.

3a. Is the system using technologies in ways the IRS has not previously employed?

The ARF does not use any new or emerging technologies in ways the IRS has not previously employed.

3b. How does the use of this technology affect taxpayer/employee privacy?

The ARF does not use any new or emerging technologies in ways the IRS has not previously employed, and therefore there is no affect on taxpayer/employee privacy.

4a. Will this system provide the capability to identify, locate and monitor individuals? If yes, explain.

No, this system provides no capability to identify, locate or monitor individuals.

4b. Will this system provide the capability to identify, locate and monitor groups of people? If yes, explain.

No, this system provides no capability to identify, locate or monitor groups of people.

4c. What controls will be used to prevent unauthorized monitoring?

Employees are required to undergo annual training on unauthorized access of tax information and sign a "UNAX" awareness statement to ensure they understand the consequences of unauthorized access. The ARF has an Audit Trail database that tracks users' access and the functions they performed while in the system.

5a. Under which system of record notice (SORN) does this system operate? Provide number and name?

The following SORNs apply to ARF:

- 24.030 Treasury/IRS Individual CADE Master File
- 24.046 Treasury/IRS Business CADE Master File
- 22.062 Treasury/IRS Electronic Filing Records
- 34.037 Treasury/IRS IRS Audit Trail and Security Records System

5b. If the system is being modified, will the SORN require amendment or revision? Explain.

The ARF is not receiving any new data. All data on the ARF will be aged off on January 16, 2005. Therefore no modifications are expected to the SORN.